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Ace GALVANIZING, INC.
429 SOUTH 96TH STREET • SEATTLE, WASHINGTON 98108 • 762-0330

May 18, 1987

Elliott Bay/Duwamish Action Team (EBAT)
Dept. of Ecology, N.W. Reginal Office
4350 - 150th Avenue N.E.
Redmond, WA 98052

Re: Our letter dated May 11, 1987.

Dear Sirs,

As indicated in referenced letter, Ace Galvanizing has initiated corrective actions to the improvements suggested by the N.W. Regional, DOE Response Team. This letter constitutes our first progress report in correcting those deficiencies noted by the Response Team. Also, as indicated in referenced letter, our periodic, updated progress reports will contain photographs of the areas where improvement actions have been taken. This procedure will continue until the areas of concern have been improved to the satisfaction of the DOE EBAT Team, DOE Response Team and Seattle/King County Health Department.

In order that all parties concerned with this project are in agreement concerning the corrective actions that must be taken, we have listed below (by Action Number), the improvements directed by the Response Team, and a narrative as to the current status of that action:

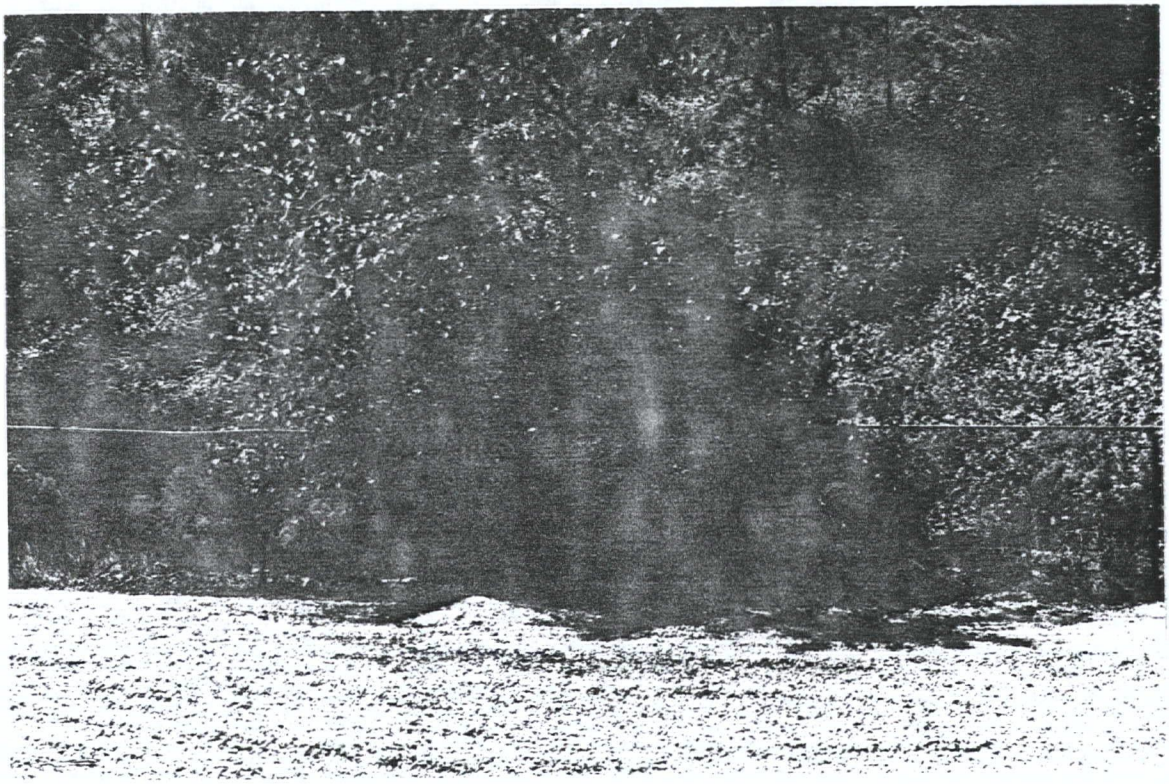
Action Narrative (current status)

1. CHARACTERIZATION OF BARRELLED BY-PRODUCTS AND CLEANUP OF OUTSIDE STORAGE AREA.

   Requirement: Barrels of Iron Sulfate and other By-products of the Galvanizing Process are to be separated by composition and color; barrels numbered and objective, discretionary samples taken for chemical analysis. Results of the analysis will determine disposal procedures in compliance with Chapter 173-303 and 173-304, WAC, and RCW's 70.95 and 70.105. Seattle/King County Health Department is to be contacted to determine extent of analysis. Barrelled By-products will be tested by groupings - these groupings will be determined by the composition and various colors of the barrelled By-products. Additionally, the outdoor area where the barrelled By-products are currently stored is to be cleaned.

   Status: All barrelled By-products have been separated by composition and color; barrels numbered, and all barrels have been moved to a sheltered warehouse area for protection from the elements pending disposal instructions to be received from Seattle/King County Health Department. Additionally, the outdoor area where the barrelled By-products were stored has been cleaned and the area gravelled over as indicated in the

photos, numbers 1 and 2, attached below.



2. COOLING WATER DRAINAGE FROM BOILER-BLOW DOWN (UNAUTHORIZED DISCHARGE TO STORM DRAINAGE).

Requirement: At the time of inspection, certain amounts of boiler water, created by daily blow-down of the boiler, were dripping outside of the building where the boiler is housed and running into the storm drainage located on South 96th Street. Additionally, DOE Response Team members questioned the status of the Storm Drainage Basin that was located outside the northern end of the building, where the boiler is housed.

Status: Plumbing for the blow-down operation has been re-routed so that drainage water is collected daily within a closed bottom sump, located indoors adjacent to the boiler. Blow-down operations are conducted daily, creating approximately 20 gallons of water. This water is now collected, as stated above, in a closed-loop system and recycled into the Water Rinse Vat located in the Galvanizing Plant. Photos of this operation will be provided in the next update letter.

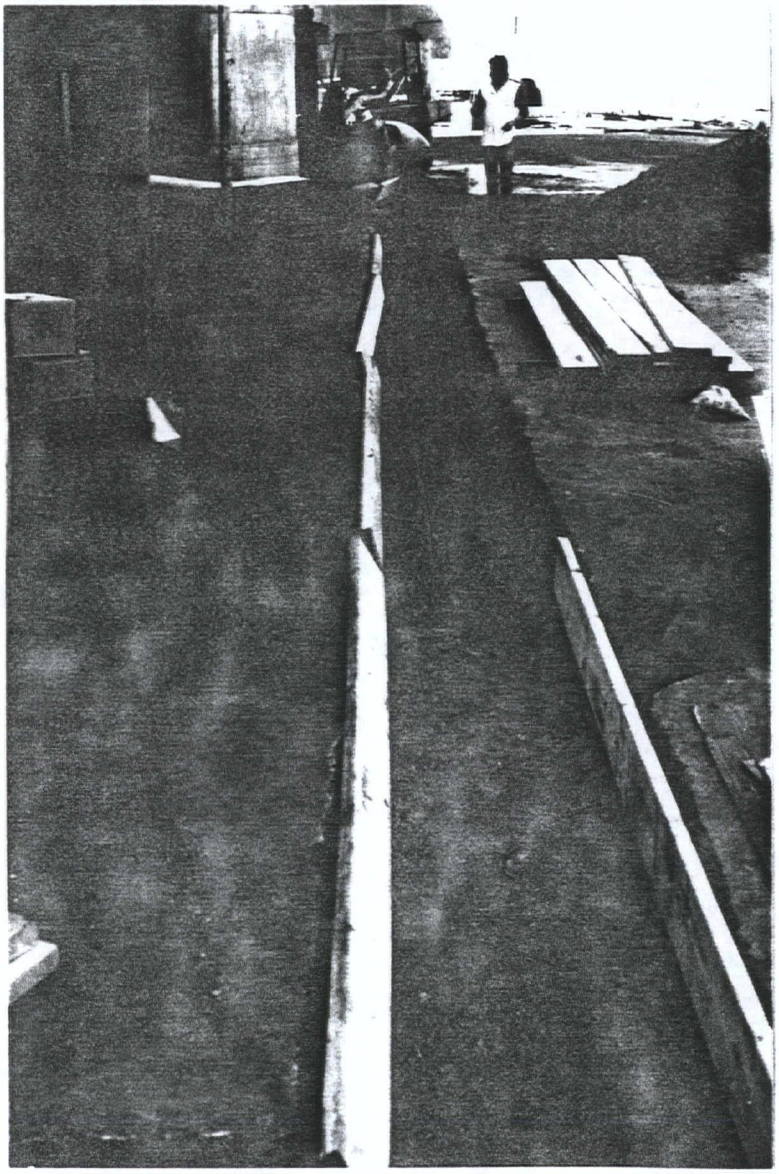
In respect to the Storm Drainage Basin, formerly located outside (north end) of the Galvanizing Building, the following comment is offerred: In May 1986, the Rainier Vista Sewer District closed this basin without knowledge or consultation with Ace Galvanizing, Inc. Unless instructed to do otherwise, we do not intend to pursue this matter further with the Rainier Vista Sewer District because there is no need for a basin in this area to meet our surface run-off requirements. Our Drainage Plan, with schematic, will be provided in a later update report.

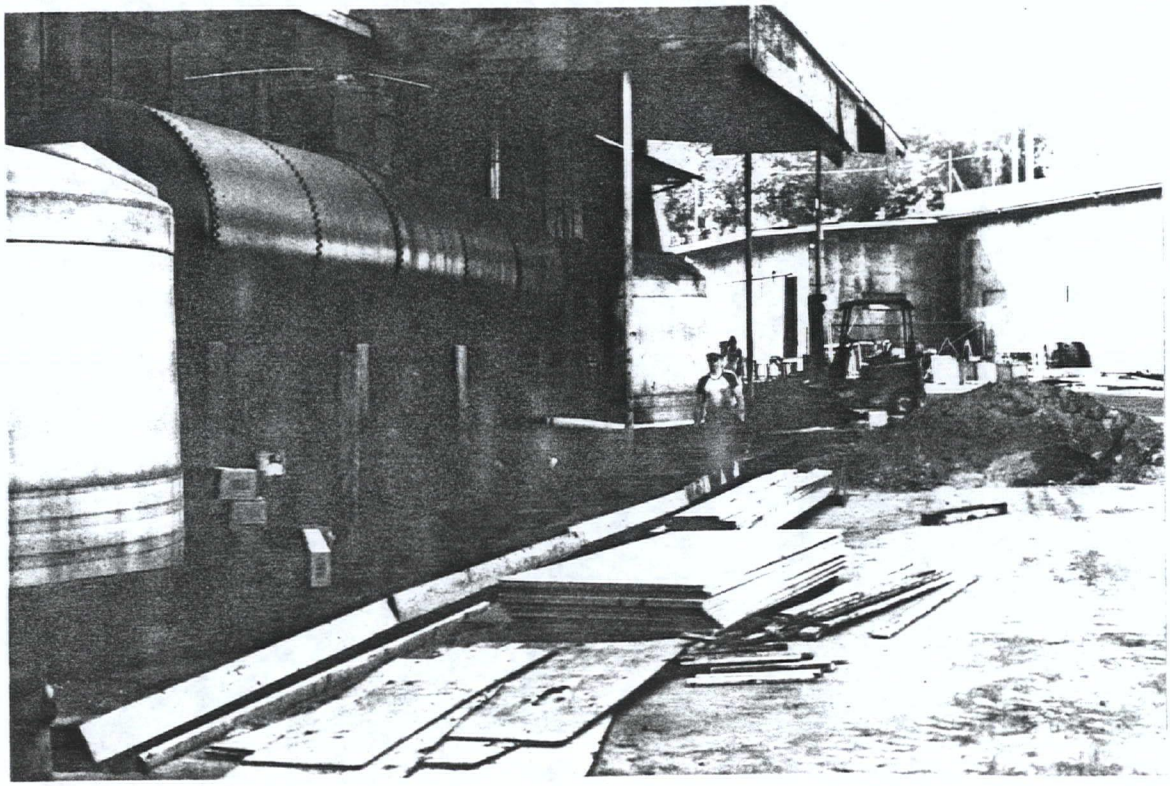
3. UNAUTHORIZED DISCHARGE TO STORM DRAINAGE, SOUTH-END OF GALVANIZING BUILDING.

Requirement: Re-route surface run-off waters by construction of a berm at the south end of the Galvanizing Building, so that the run-off does not enter the galvanizing area, and then continue on into the Storm Drainage Sump. Additionally, there is a need to minimize the generation of uncontaminated water inside the galvanizing area. Uncontaminated water originates from two different sources: Surface run-off as indicated above, and drippings from the galvanizing rinse tank, where products to be galvanized are rinsed prior to "pickling". Surface run-off waters, generated by the two sources identified above, picked-up corrosives in the galvanizing area and drained into the storm drainage sump, resulting in an unauthorized discharge of water with a high acidic PH factor. To prevent this from occurring again, a requirement to contain the galvanizing area has been directed by DOE. The inspectors also questioned the disposition of the water that flows into a closed bottom sump located in the galvanizing area adjacent to the galvanizing tanks. Also, the inspectors pointed out the need to educate and train employees in the need to prevent surface run-off and the need for the Company to develop a Contingency Plan for Spill Prevention and Containment.

3. UNAUTHORIZED DISCHARGE TO STORM DRAINAGE, continued.

Status: Work has been initiated to re-route surface run-off away from the galvanizing building. A Concrete Berm will be constructed to direct the surface run-off flow to the storm drainage sump located at the southeastern end of the building. Additionally, a Retaining Wall is under construction that would contain any spillage from the storage tanks on the western side of the galvanizing building and also serve as a berm to direct surface run-off to the southeastern storm drainage sump (see photos number 3 and 4, below and on page five). This will be further described in our Drainage Plan to be submitted later to DOE.



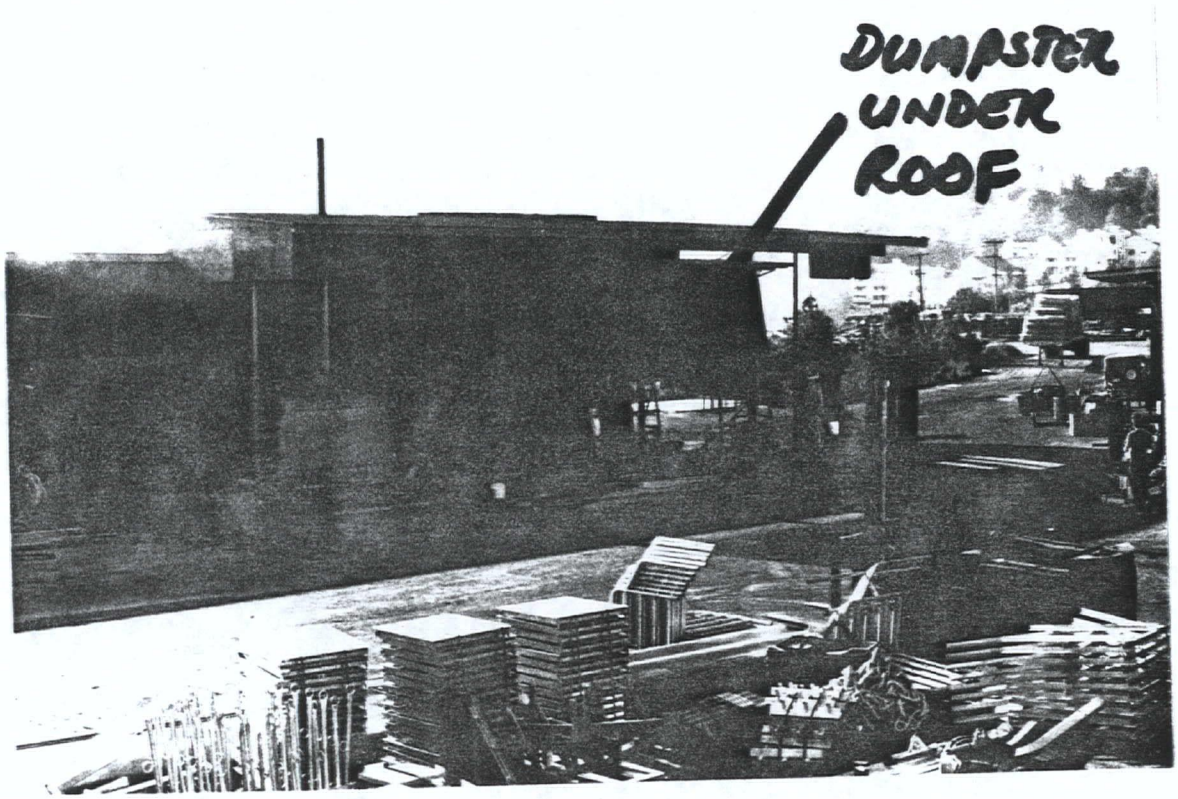


Additionally, a Retaining Wall is under construction along the eastern side, and within the Galvanizing Building, where surface run-off with the high acidic PH Factor escaped into the storm drainage sump located at the southeastern corner of the Galvanizing Building. This Eastern Retaining Wall, located within the Galvanizing Building, will contain the process area as requested by the Response Team. Additionally, the employees have received instruction and training concerning the need to prevent surface run-off and, in general, the need for better "housekeeping". Also, the Company has directed the Environmental Consultant to write a Spill Prevention and Containment Contingency Plan. A copy of this plan will be provided to DOE when completed.

4. CONDITION OF DUMPSTER.

Requirement: Materials placed within the dumpster must be suitable for landfill disposal only. As is, the dumpster does not meet minimal functional standards in that there appears to be fluid running out the bottom, which contributes to the surface run-off problem. Need to place the dumpster in a "car-port" type structure where precipitation will not enter into the dumpster itself.

Status: Only wastes suitable for landfill disposal are placed in the dumpster. The dumpster will be placed under a permanent roof structure located on the western side of the Galvanizing Building, as indicated by the arrow on photo number 5 on page six. The dumpster will be in place as soon as the retainer wall and run-off berm have been completed.

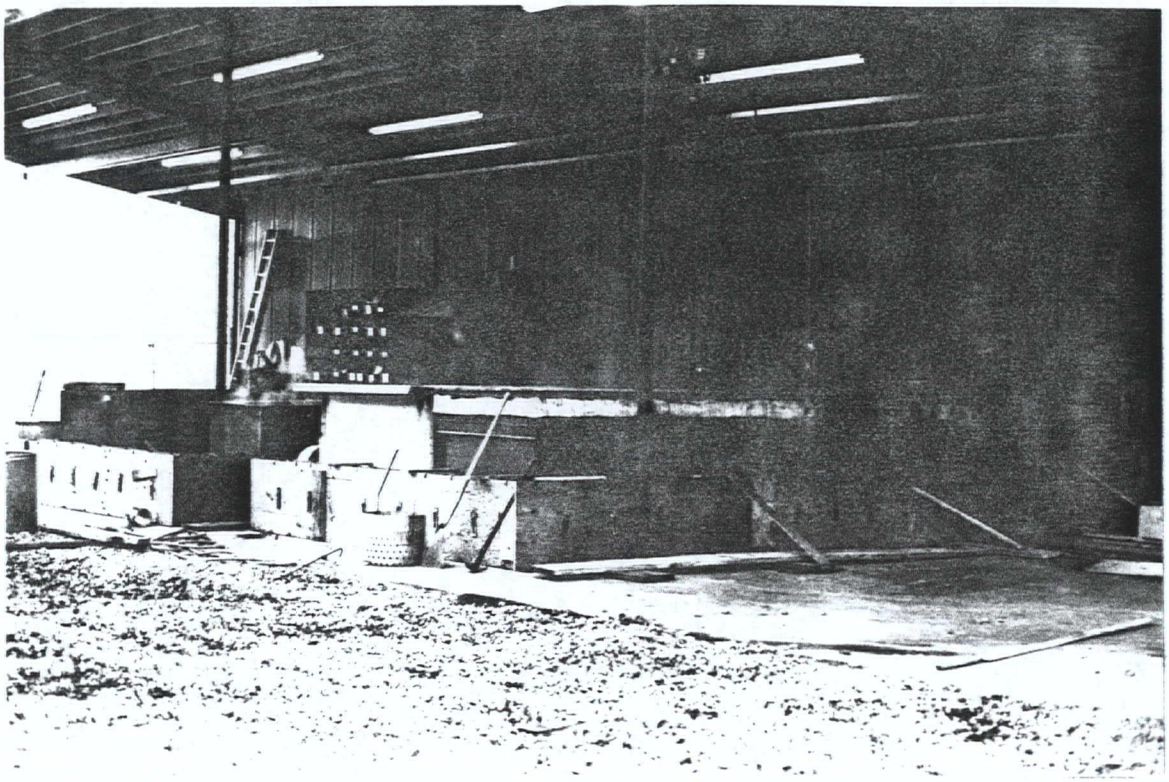


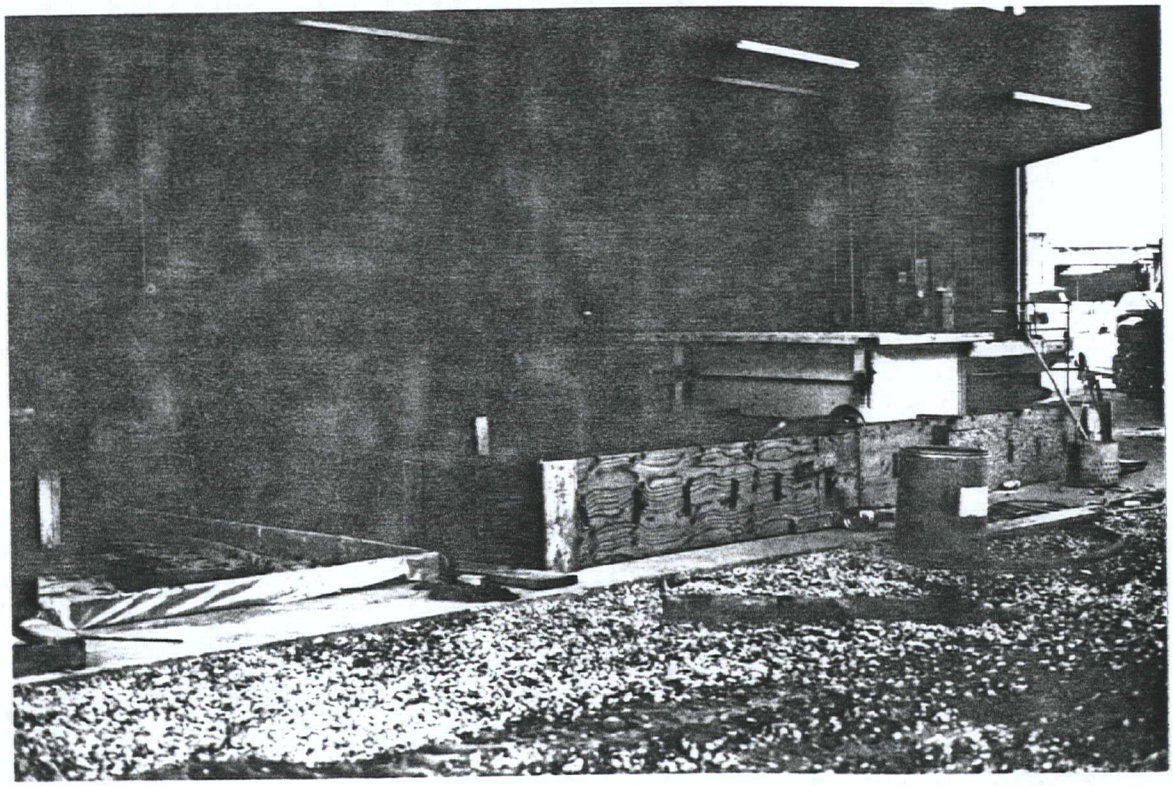
5. HOUSEKEEPING.

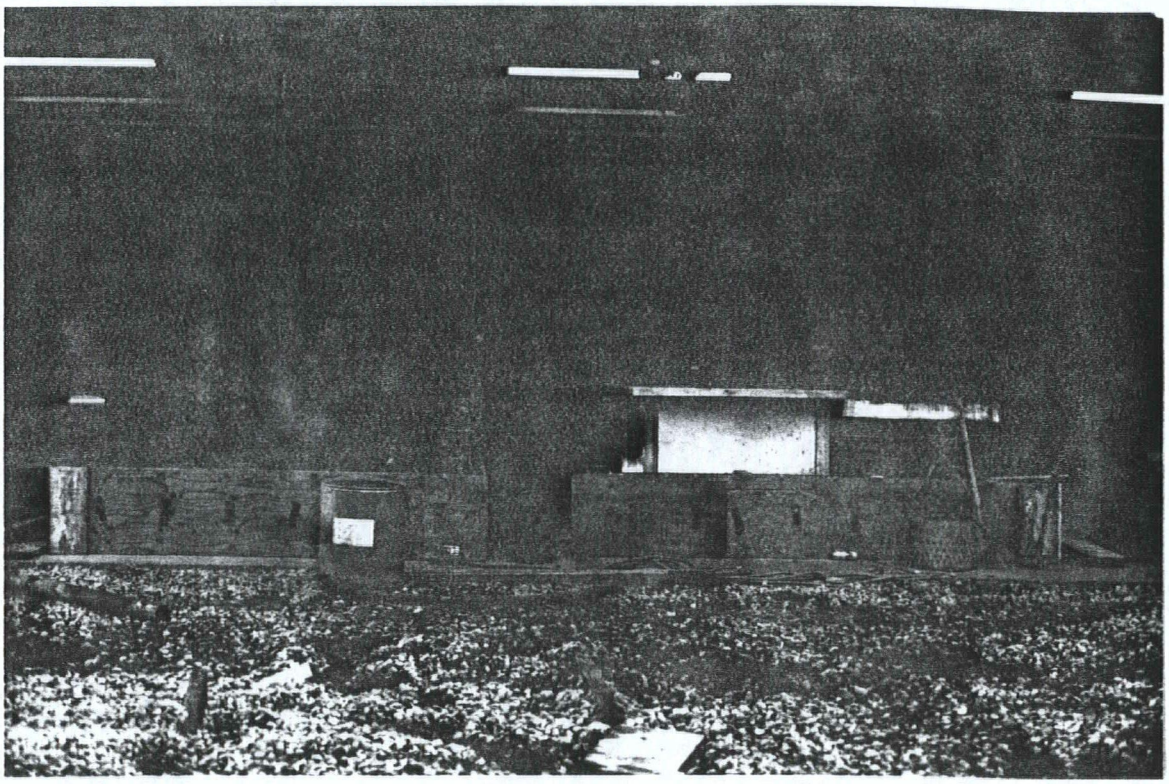
Requirement: Surface run-off must be kept out of galvanizing and other process areas. Process area must be contained and surface run-off minimized so that process materials are not "tracked" by employees and equipment to other areas of the plant site, and then eventually into the storm drainage system.

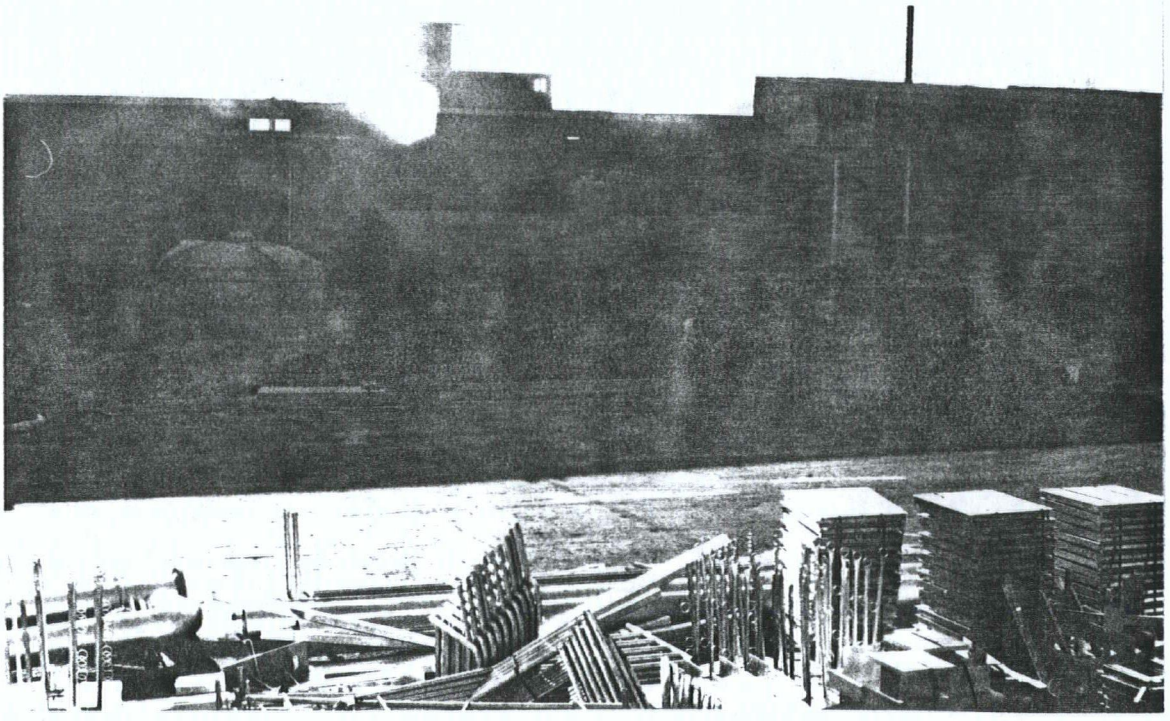
Status: Containment in the form of retaining walls and run-off berms are under construction throughout the facility. Employees have also been trained to improve "housekeeping" operations. Photos number 6 through 9 demonstrate on going containment construction.

Please see pages seven and eight for these photos.





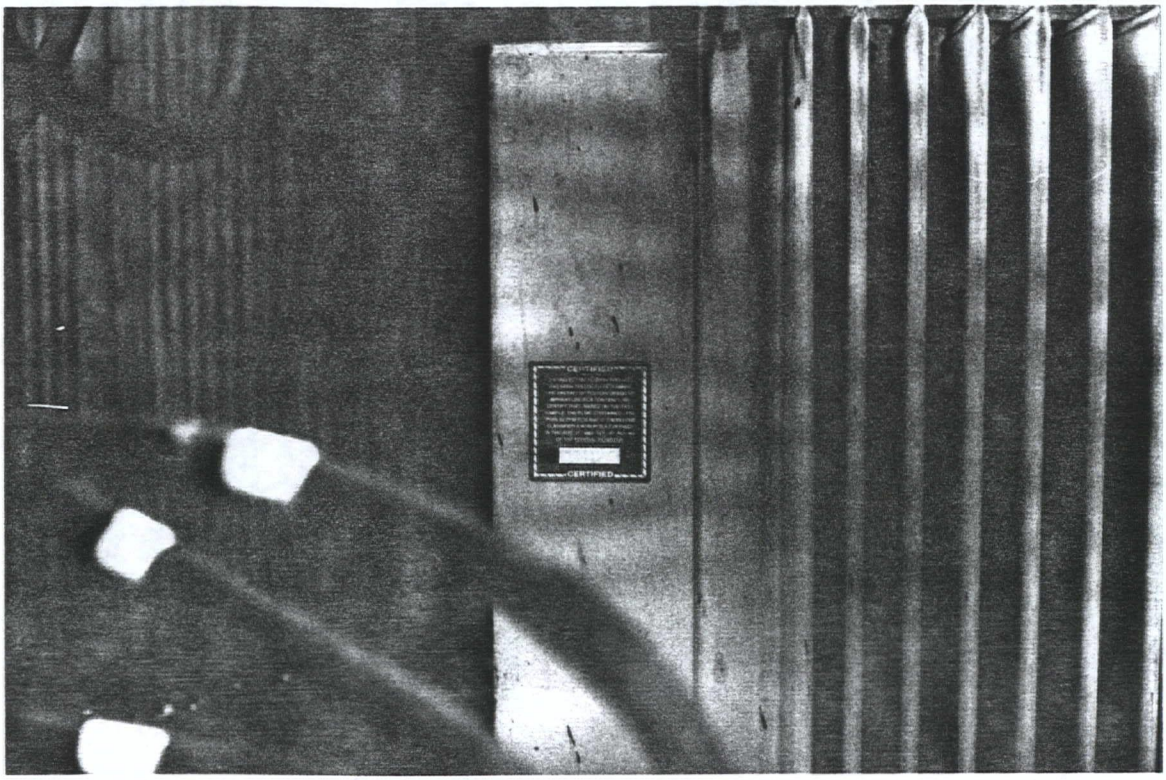




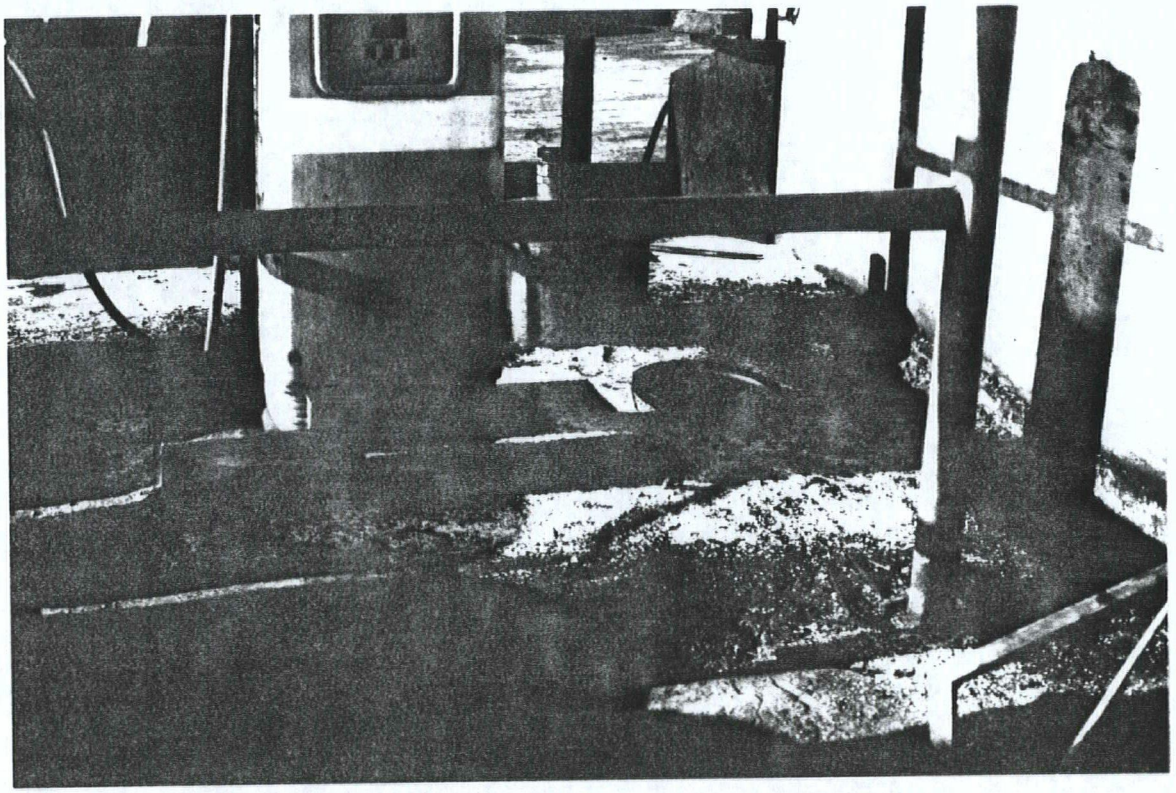
6. AREA BETWEEN ANCHOR POST PRODUCTS CO. AND ACE GALVANIZING.

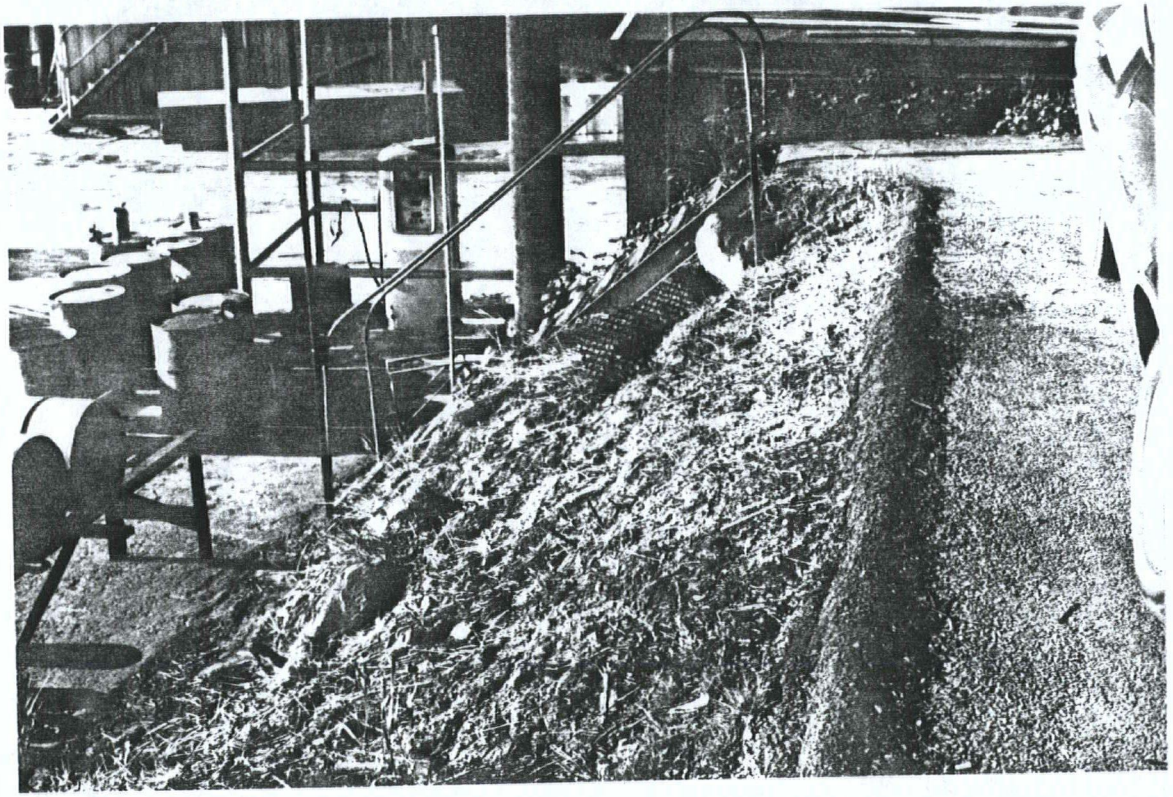
Requirement: Subject area needs to be cleaned. An electrical transformer is located in this area that could contain PCB's. Please verify and clean according to PCB concentration (if any). Also, notify employees accordingly. Additionally, the area around the air compressor tank needs cleaning as well as the area around the gasoline pump. Also, the western bank adjacent to the stairs to the lower yard level needs to be cleaned.

Status: The electrical transformer was closely inspected and a certication by Seattle City Light indicates that the oil contains less than 50PPM/PCB. Nevertheless, the area is fenced and secured from employee intervention. See photo number 10, below, indicating inspection decal.



The areas around the air compressor tank, gasoline pump and the western bank are being cleaned as indicated in photos number 11 through 13. Additionally, retention walls are under construction around the gasoline pump as can be seen photo number 12. These photos follow on page ten and page eleven.





7. DEFINE ACE GALVANIZING INDUSTRIAL PROCESS-BASIC SITE DRAWING AND OVERLAYS.

Requirement: The DOE Inspectors were concerned about Industrial Waste Discharge and Surface Run-off and the disposition of Industrial Process By-Products. In order to clearly define these processes, the inspectors requested a description of the galvanizing and pickling process and basic drawings and diagrams indicating the flows of materials in and out of the process. They suggested a basic site plan with the industrial process transposed on the site plan accompanied by a description of the galvanizing and pickling process.

Status: A Description of the Galvanizing and Pickling Process will be forth-coming, along with a site plan that will describe the industrial process as well as the drainage system.

This completes Progress Report Number One(1). Progress Report Number Two(2) will be submitted as soon as on going work is completed.

Sincerely,

Michael Buckland

Michael Buckland, General Manager

cc: N.W. Regional Response Team
Attention: Mr. Ron Devitt
Dept. of Ecology
4350 - 150th Avenue N.E.
Redmond, WA 98052

Mr. Wally Swafford
Toxic and Hazardous Wast Coordinator
Seattle/King County
1510 Public Safety Building
Seattle, WA 98104

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